

**\*\*\*CONFIDENTIAL PREDECISIONAL DOCUMENT\*\*\*****PRELIMINARY ASSESSMENT CONSULTATION MEMO**

**Submitted To:** Philip Armstrong

**Prepared By:** Maynard Geisler  
Bechtel Environmental, Inc.

**Site:** Kustom Fit Hi-Tech Seating Products, Inc.  
(aka Shellmar Products Corporation)  
8990 Atlantic Ave.  
South Gate, Calif., 90280

**Site EPA ID Number:** CAD 983576190

**PA Consultation Date:** August 8, 1994

**Review and Concurrence:** Catherine C. Walton

**cc to EPA Document Coordinator:** J. Quint, H-8-1

This memo documents the occurrence of the Preliminary Assessment (PA) Consultation held with the U.S. Environmental Protection Agency (EPA), Superfund Site Assessment Program in Region 9; initial site findings; and the decision to advance the site to the Site Inspection (SI) stage of evaluation. A combined PA/SI report will be completed at the end of the SI evaluation. The following documents the initial site and HRS findings:

**SITE & HAZARD RANKING SYSTEM (HRS) CONSIDERATIONS:**

The apparent problems at the site are:

- In 1950, the Shellmar Products Corporation, a cellophane package manufacturer, maintained three aboveground solvent tanks on site. The type of solvent used and the length of occupancy by the Shellmar Products Corporation are unknown. The current site operator, Kustom Fit Hi-Tech Seating Products, Inc. (formerly known as Kustom Fit Manufacturing) has been on site since 1977. Hazardous substances used by Kustom Fit Hi-Tech Seating Products, Inc. include 1,1,1-trichloroethane (1,1,1-TCA) and toluene diisocyanate.
- Analytical results of a 1992 subsurface investigation on site indicated the presence of tetrachloroethene, a substance also known as perchloroethene (PCE), and 1,1,1-TCA in onsite soils.

The pertinent HRS factors associated with the site are:

- Approximately 64 drinking water supply wells, which contribute to systems that serve approximately 342,000 people, are located within 4 miles of the site.
- PCE has been detected in groundwater at City of South Gate Well 7, located approximately 0.25 mile downgradient of the site.

Attachment: HRS Scoresheets w/rationale

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**For EPA Use Only**

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Based on initial site and HRS information, this documents my determination to advance the site to the SI level of evaluation. The Contractor has been tasked to proceed with the SI as of the PA Consultation date indicated above.

EPA Site Assessment Manager Signature:

  
\_\_\_\_\_

Date:

  
\_\_\_\_\_

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**SUMMARY SCORESHEET  
FOR COMPUTING PROJECTED HRS SCORE**

**SITE NAME:** Kustom Fit Hi-Tech Seating Products, Inc. (aka Shellmar Products Corporation)

**CITY:** South Gate **COUNTY:** Los Angeles

**EPA ID #:** CAD 983756190 **EVALUATOR:** Maynard Geisler

**PROGRAM ACCOUNT #:** \_\_\_\_\_ **DATE:** Aug 8, 1994

**LAT/LONG:** 33° 56' 54.5 N / 118° 10' 52.0 W **T/R/S:** T2S/R12W

**THIS SCORESHEET IS FOR A PA:** X **SI:** \_\_\_\_\_

**OTHER:** \_\_\_\_\_

**RCRA STATUS (check all that apply):**

\_\_\_\_\_ Generator

\_\_\_\_\_ Small Quantity Generator

\_\_\_\_\_ Transporter

\_\_\_\_\_ TSDF

X Not Listed in RCRA Database as of  
(Date of Printout) 4/15/94

**STATE SUPERFUND STATUS:**

\_\_\_\_\_ DTSC Annual Work Plan  
(formerly BEP) (Date) \_\_\_\_\_

\_\_\_\_\_ WQARF (Date): \_\_\_\_\_

X No State Superfund  
Status (Date): 12/20/93

	S Pathway	S <sup>2</sup> Pathway
Groundwater Migration Pathway Score (S <sub>gw</sub> )	100.00	10000.00
Surface Water Migration Pathway Score (S <sub>sw</sub> )	*	*
Soil Exposure Pathway Score (S <sub>s</sub> )	*	*
Air Migration Pathway Score (S <sub>a</sub> )	*	*
$(S_{gw}^2 + S_{sw}^2 + S_{se}^2 + S_{am}^2)$		10000.00
$(S_{gw}^2 + S_{sw}^2 + S_{se}^2 + S_{am}^2) / 4$		2500.00
$\sqrt{(S_{gw}^2 + S_{sw}^2 + S_{se}^2 + S_{am}^2) / 4}$		50.00

\* Pathway evaluated, but not assigned a score (explain):

\* The Surface Water Migration Pathway was evaluated but not assigned a score. Although the Los Angeles River is located 0.5 mile east of the site, water from the river is not used for drinking water. There are no fisheries associated with the Los Angeles River or sensitive environments within 10 miles downstream of the site.

\* The Soil Exposure and Air Migration Pathways were evaluated but not assigned scores because the site is completely covered by asphalt, concrete, and buildings. There are no schools, daycare centers, or residences on site.



## GROUNDWATER MIGRATION PATHWAY SCORESHEET

Likelihood of Release	Maximum Value	Score	Rationale	Data Quality
1. Observed Release	550	550	1	E
2. Potential to Release				
2a. Containment	10			
2b. Net Precipitation Value	10			
2c. Depth to Aquifer Value	5			
2d. Travel Time	35			
2e. Potential to Release [lines 2a x (2b+2c+2d)]	500	0		
3. Likelihood of Release (line 1 or 2e)	550	550		

## Waste Characteristics

4. Toxicity/Mobility	(a)	100	2	H
5. Hazardous Waste Quantity	(a)	10	3	E
6. Waste Characteristics (lines 4 x 5, then use Table 2-7)	100	6		

## Targets

7. Nearest Well Value	50	50	4	E
8. Population				
8a. Level I Concentrations	(b,c)	107,140	4,5	E
8b. Level II Concentrations	(b,c)	0		
8c. Potential Contamination	(b,c)	5,788	5	H
8d. Population (lines 8a+8b+8c)	(b)	112,928		
9. Resources	5	5	6	E
10. Wellhead Protection Area	20	0	7	
11. Targets (lines 7+8d+9+10)	(b)	112,983		

## Aquifer Score

12. Aquifer Score [(lines 3 x 6 x 11)/82500, Subject to a Maximum of 100]	100	100.00
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## GROUNDWATER MIGRATION PATHWAY SCORE

13. Pathway Score (Sgw) (Highest score from line 12 for all aquifers evaluated, subject to a maximum of 100)	100	100.00
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- (a) Maximum value applies to waste characteristics category.  
 (b) Maximum value not applicable.  
 (c) Value computed on attached calculation sheet.

AQUIFER EVALUATED Upper and Lower Group Aquifers



# GROUNDWATER PATHWAY CALCULATIONS FOR POPULATION

## ACTUAL CONTAMINATION

Well Identifier	Contaminant Detected	Contaminant Concentration (µg/l)	Benchmark (mg/l)	Apportioned Level Multiplier* (A)	Apportioned Population Well Serves (B)	Actual Contamination Factor (A x B)
South Gate 7	PCE	1.5	6.7x10 <sup>-4</sup>	10	10,714	107,140
SUM LEVEL I CONCENTRATIONS						107,140
SUM LEVEL II CONCENTRATIONS						0

### \* Level Multipliers:

Level I = 10.

Level II = 1.

## POTENTIAL CONTAMINATION

Distance Ring (Miles)	Number of Wells Within Distance Ring	Population Served by Wells Within Distance Ring	Distance Weighted Population Values (Table 3-12)
0.00 to 0.25			
>0.25 to 0.50	3	32,143	32,325
>0.50 to 1.00	2	13,964	5,224
>1.00 to 2.00	16	55,874	9,385
>2.00 to 3.00	22	75,588	6,778
>3.00 to 4.00	20	99,825	4,171
			57,883
POTENTIAL CONTAMINATION: SUM/10			5,788.3

AQUIFER EVALUATED Upper and Lower Group Aquifers

## KUSTOM FIT HI-TECH SEATING PRODUCTS, INC. HAZARD RANKING SYSTEM RATIONALE

1. An observed release to groundwater cannot be established for the Kustom Fit Hi-Tech Seating Products, Inc. site at this time. Documented hazardous substance use on site includes 1,1,1-trichloroethane (1,1,1-TCA). In 1992, soil samples collected by Dames & Moore on site from a depth of 0.5 feet below ground surface (bgs) were analyzed for volatile organic compounds (VOCs) using EPA Method 8240. Analytical results of soil samples indicated the presence of 1,1,1-TCA at concentrations ranging from non detect to 88 micrograms per kilogram ( $\mu\text{g/kg}$ ). Tetrachloroethene (PCE) was detected in site soil at concentrations ranging from non detect to 6.3  $\mu\text{g/kg}$ . Trichloroethene (TCE) was not detected in on site soil. There is no documented use of PCE or TCE on site. However, the site is located in an industrial land-use area and on site operations prior to 1977 are not well documented.

There are approximately eight aquifers beneath the site. These aquifers are grouped into the upper group aquifers (three aquifers) and the lower group aquifers (five aquifers). Upper group aquifers begin at approximately 80 feet bgs and extend to approximately 350 feet bgs. Lower group aquifers begin at approximately 400 feet bgs and extend to 1,200 feet bgs. There are no groundwater analytical data from the shallowest aquifer directly beneath the site. The nearest drinking water supply well, City of South Gate well 7, is located approximately 0.25 mile hydraulically downgradient (north) of the site and is screened from 500 to 600 feet bgs. In 1992, groundwater from this well was sampled by the City of South Gate and analyzed for VOCs using EPA Method 524.2. PCE was detected at a concentration of 1.5 micrograms per liter ( $\mu\text{g/l}$ ) and TCE was detected at a concentration of 6.3  $\mu\text{g/l}$ . City of South Gate well 23, is located approximately 0.25 mile hydraulically upgradient (south) of the site and is screened from 530 to 624, 662 to 692, and 772 to 798 feet bgs. In 1992, groundwater from this well was sampled by the City of South Gate and analyzed for VOCs using EPA Method 524.2. PCE was detected at a concentration of 0.9  $\mu\text{g/l}$ . TCE was not detected. Although PCE has been detected in on site soils and in a drinking water supply well located hydraulically downgradient from the site, an observed release to groundwater cannot be established since concentrations detected in the downgradient well were not greater than three times background levels. In addition, although TCE was detected in a downgradient well and not detected in an upgradient well, TCE is not attributable to the site. Therefore, an observed release has been projected. An Observed Release factor value of 550 is assigned. U.S. Environmental Protection Agency, Hazard Ranking System, 40 CFR Part 300, Appendix A, Final Rule, 55 FR 51532, December 14, 1990 (HRS).

Sources: Nia Christoforakis, SWIFT Adhesives, Letter to Mr. Juan Hernandez, Kustom Fit Manufacturing Company, June 21, 1993.

Dames & Moore, Limited Subsurface Soil Investigation, 8990 Atlantic Avenue, South Gate, California, for Kustom Fit, October 12, 1992.

Geisler, Maynard, Bechtel Environmental, Inc., Site Reconnaissance Interview and Observations Report, July 20, 1994.

West Basin and Central Basin Municipal Water Districts, Cooperative Basin-Wide Title 22 Groundwater Monitoring Program, 1992 Annual Water Quality Report, June 1993.

California Division of Water Resources, Well Log 1514A, October 19, 1948.

California Division of Water Resources, Well Log 3S/12W-6B3, May 30, 1952.



2. As described in Rationale 1, 1,1,1-TCA and PCE have been detected in on site soils at concentrations three times background levels. According to the Superfund Chemical Data Matrix (SCDM), June 24, 1994, the toxicity value for PCE is 100. A mobility value of 1 was assigned since an observed release is being projected. Therefore, a Toxicity/Mobility Value of 100 is assigned in accordance with the HRS.

Hazardous Substance	Toxicity	Mobility	Toxicity/Mobility
1,1,1-trichloroethane (1,1,1-TCA)	1	1	1
tetrachloroethene (PCE)	100	1	100

Sources: US Environmental Protection Agency, Superfund Chemical Data Matrix, July 22, 1994

Dames & Moore, Limited Subsurface Soil Investigation, 8990 Atlantic Avenue, South Gate, California, for Kustom Fit, October 12, 1992.

3. There are currently no hazardous wastes generated or stored on site. The area of PCE and 1,1,1-TCA contaminated soil on site is not well defined. Soil samples collected from 0.5 and 5 feet bgs from four soil borings drilled on site were analyzed for VOCs by EPA Method 8240. One soil sample collected from 10 feet bgs was also analyzed for VOCs by EPA Method 8240. PCE was detected in one soil sample collected from a depth of 0.5 feet bgs near the truck service area. Because historic site operations are not well documented, calculation of the Hazardous Waste Quantity factor value is based on known areas of hazardous substance use by the current site operator (truck service area) and suspected areas of historic site operator hazardous substance use (aboveground solvent storage tanks) in the eastern fifth of the site. It is assumed that soil beneath the eastern fifth of the site is contaminated with PCE and 1,1,1-TCA. Using Tier D from Table 2-5 of the HRS for contaminated soil, a default Hazardous Waste Quantity factor value of 10 is assigned.

Source	Tier	Quantity	Divisor	Waste Quantity Value
Contaminated Soil	D	1.4 acres (60,984 square feet )	34,000	1.8

Sources: Dames & Moore, Limited Subsurface Soil Investigation, 8990 Atlantic Avenue, South Gate, California, for Kustom Fit, October 12, 1992.

Geisler, Maynard, Bechtel Environmental, Inc., Site Reconnaissance Interview and Observations Report, July 20, 1994.

Sanborn Insurance Map, Volume 29, Map 2914, Los Angeles Series, October 11, 1950.



4. As described in Rationale 1, an observed release has been projected to groundwater beneath the site. Actual contamination is being projected to City of South Gate well 7 since PCE has been detected in groundwater from this well at a concentration of 1.5 µg/l. Since this is above the cancer risk screening concentration of  $6.7 \times 10^{-4}$  milligrams per liter (mg/l), Level I concentrations were projected to this well. Therefore, according to page 51603 of the HRS, a value of 50 is assigned for the Nearest Well Factor Value.

Source: West Basin and Central Basin Municipal Water Districts, Cooperative Basin-Wide Title 22 Groundwater Monitoring Program, 1992 Annual Water Quality Report, June 1993.

5. As described in Rationale 4, Level I concentrations of PCE have been projected to groundwater in the City of South Gate well 7. A target value of 107,140 is assigned for Actual Contamination at well 7. A Distance-Weighted Population Value of 6,677 is assigned for Potential Contamination of the remaining drinking water wells within 4 miles of the site. Rationale Table 1 shows the calculation of the population served by groundwater within 4 miles of the site. The population apportionment calculations for each drinking water supply well are as follows:

The City of Huntington Park operates a blended drinking water supply system that serves approximately 52,000 people. The system uses 100 percent groundwater which is pumped from six active drinking water wells, four of which are within 4 miles of the site. No single well contributes greater than 40 percent to the system. (52,000 people ÷ 6 wells = 8,667 people served per well.)

The Southern California Water Company operates two drinking water supply district's within 4 miles of the site. These include the Bell Gardens and the Hollydale Districts. The Bell Gardens District serves approximately 23,209 people and consists of 10 active drinking water wells which supply 35 percent of the districts drinking water. The remaining 65 percent is imported surface water purchased from the Metropolitan Water District. The surface water intake contributes greater than 40 percent to the system. There are eight wells within 4 miles of the site. (23,209 people x 35 percent groundwater ÷ 10 wells = 812 people served per well.) The Hollydale District serves approximately 5,461 people and consists of 2 active drinking water wells and one standby well which supply 100 percent of the drinking water. All the wells are within a 4 mile radius of the site. (5,461 people ÷ 3 wells = 1,820 people served per well.)

The City of South Gate operates a blended drinking water supply system that serves approximately 75,000 people. The system uses 100 percent groundwater which is pumped from seven active drinking water wells, all of which are within 4 miles of the site. No single well contributes greater than 40 percent to the system. (75,000 people ÷ 7 wells = 10,714 people served per well.)

The City of Vernon operates a blended drinking water supply system that serves approximately 47,000 people. The system includes nine active drinking water wells, six of which are within 4 miles of the site. No single well contributes greater than 40 percent to the system. (47,000 people ÷ 9 wells = 5,222 people served per well.)

The Maywood Mutual Water Company No. 1 operates a blended drinking water supply system that serves approximately 5,000 people. Two active drinking water wells contribute approximately 67 percent of the water to the system, the remaining 33 percent is surface water purchased from the Metropolitan Water District. No single well or intake contributes greater than 40 percent to the system. Both drinking water wells are within 4 miles of the site (5,000 people ÷ 2 wells and 1 intake = 1,667 people served per well or intake).



The Maywood Mutual Water Company No. 2 operates a blended drinking water supply system that serves approximately 6,600 people. The system includes two active drinking water wells, both of which are within 4 miles of the site. The drinking water wells contribute approximately 50 percent of the water to the system and the remaining 50 percent is surface water purchased from the Metropolitan Water District. A surface water intake contributes greater than 40 percent to the system. (6,600 people x 50 percent groundwater ÷ 2 wells = 1,650 people served per well.)

The Maywood Mutual Water Company No. 3 operates a blended drinking water supply system that serves approximately 10,000 people. The system includes three active drinking water wells, all of which are within 4 miles of the site. No single well contributes greater than 40 percent to the system. (10,000 people ÷ 3 wells = 3,333 people served per well.)

The Tract 180 Water Company operates a blended drinking water supply system that serves approximately 14,000 people. The system includes two active drinking water wells, both of which are within 4 miles of the site. No single well contributes greater than 40 percent to the system. (14,000 people ÷ 2 wells = 7,000 people served per well.)

The Tract 349 Mutual Water Company operates a blended drinking water supply system that serves approximately 6,500 people. The system includes two active drinking water wells, both of which are within 4 miles of the site. No single well contributes greater than 40 percent to the system. (6,500 people ÷ 2 wells = 3,250 people served per well.)

The City of Lynwood operates a blended drinking water supply system that serves approximately 65,000 people. Seven active drinking water wells contribute approximately 75 percent of the water to the system with the remaining 25 percent is surface water purchased from the Metropolitan Water District. According to Van Nguyen of the City of Lynwood, an eighth well, once used as a standby well, will be destroyed this year. No single well or intake contributes greater than 40 percent to the system. All of the active drinking water wells are within 4 miles of the site. (65,000 people ÷ 7 wells and 1 intake = 8,125 people served per well or intake.)

The City of Downey operates a blended drinking water supply system that has approximately 23,000 service connections. According to the US Bureau of Census, 1990 Census of Population and Housing Characteristics, Calif., the average number of people per household in Downey is 2.77. Twenty-one active drinking water wells contribute approximately 95 percent of the water to the system, the remaining 5 percent is surface water purchased from the Metropolitan Water District. No single well or intake contributes greater than 40 percent to the system. Sixteen of the twenty-one active wells are within 4 miles of the site. [(23,000 service connections x 2.77 people per connection ÷ 21 wells and 1 intake = 2,895 people served per well or intake.)]

The Walnut Park Mutual Water Company operates a blended drinking water supply system that serves approximately 14,722 people. The system includes four active drinking water wells and imports surface water from Metropolitan Water District. Since June 1, 1993, approximately 80 percent of the drinking water is supplied by imported surface water. All four wells are within 4 miles of the site. (14,722 people x 20 percent served by groundwater wells ÷ 4 wells = 736 people served per well.)

Sources:

Armijo, Bency, City of Huntington Park, Department of Public Works, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 25, 1994.

Gocłowski, Clara Patricia, Southern California Water Company, Letter to Heather L. McAdams (with enclosures), Bechtel Environmental, Inc., May 13, 1994.

Chambers, John, City of South Gate, Public Works Department, Telephone conversation recorded on Contact Report by Maynard Geisler, Bechtel Environmental, Inc., May 3, 1994.

Yasutake, Adrian, City of Vernon Water Department, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 14, 1994.

Jewett, Monte, Maywood Mutual Water Company No. 1, Telephone conversation recorded on Contact Report by Maynard Geisler, Bechtel Environmental, Inc., April 20, 1994.

Rickabaugh, Warren, Maywood Mutual Water Company 2, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 18, 1994.

Fick, Ronald, Maywood Mutual Water Company 3, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 14, 1994.

Long, Randy, Tract 180 Water Company, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 18, 1994.

Provencal, Edwina, Tract 349 Mutual Water Company, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 15, 1994.

Nguyen, Van, City of Lynwood Department of Water, Telephone conversation recorded on Contact Report by Maynard Geisler, Bechtel Environmental, Inc., April 25, 1994.

Vasquez, Tony, City of Downey Water Division, Telephone conversation recorded on Contact Report by Maynard Geisler, Bechtel Environmental, Inc., April 20, 1994.

Borden, Janet, Walnut Park Mutual Water Company, Telephone conversation recorded on Contact Report by Virginia Demetrios, Bechtel Environmental, Inc., April 18, 1994.

6. It is assumed that there are wells used for irrigation within 4 miles of the site. Therefore a of 5 is assigned for Resources.
7. A value of 0 is assigned for Wellhead Protection Area. There are, as of yet, no wellhead protection areas defined in California.